

EXHIBIT 167

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF W. TAYLOR REVELEY, III

Pursuant to 28 U.S.C. § 1746 (2), I, W. Taylor Reveley III, hereby declare as follows:

1. I am President of the College of William Mary (“William & Mary” or “the university”), and have served in that capacity since September 2008. I had previously served as interim president of the university for six months, and as dean of William & Mary Law School for almost a decade. Before joining William & Mary, I practiced law at Hunton & Williams LLP for 28 years, including nine years as the firm’s managing partner. As President, I serve as the chief executive officer of William & Mary. I have personal knowledge of the matters set forth below or have knowledge of those matters based on my review of information and records gathered by members of my staff.
2. William & Mary is a public, liberal arts university with over 6,000 undergraduate students and over 2,300 graduate students.¹ William & Mary recruits and attracts a diverse student body. Our students come from all 50 states, the District of Columbia, and 60 foreign countries. William & Mary is dedicated to a diverse student and faculty population. Among the university’s goals, as set out in its Mission Statement, are to attract outstanding students from diverse backgrounds and to develop a diverse faculty which is nationally and internationally recognized for excellence in both teaching and research.²

¹ See <http://www.wm.edu/about/wmataglance/index.php>.

² See William & Mary Mission Statement at <http://www.wm.edu/about/administration/provost/about/mission/index.php>.

3. William & Mary has approximately 23 students enrolled across the university in 2017 who are participants in the Citizenship and Immigration Services' Deferred Action for Childhood Arrivals ("DACA").³
4. William & Mary DACA-enrolled students make valuable contributions to the university, through their classroom participation, their extra-curricular engagements, and their commitment to independent study and research. The DACA program provides meaningful benefits to its DACA student population and the rest of the university community. For instance, the DACA program provides its William & Mary students with legal protections and financial opportunities that have enhanced their ability to take full advantage of our educational programs.⁴ The DACA program has also benefitted William & Mary as a whole because DACA students contribute their unique perspectives inside and outside the classroom and help the university foster a culture of inclusion.
5. For as long as they have active DACA protection, DACA students enrolled at William & Mary can pursue their courses of study and fully invest themselves in their educational endeavors, without fear of sudden detention or removal. Discontinuance of DACA would withdraw the educational opportunities these students enjoy and subject them to deportation.
6. The elimination of the DACA program would also lessen the effect of William & Mary's investment of significant financial and human resources in its students and in preparing a

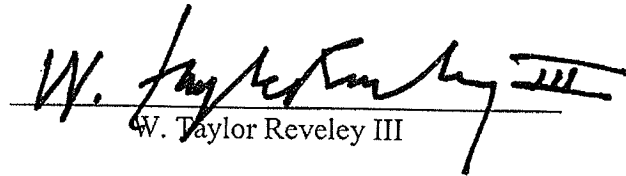
³ This calculation reflects students who opted to self-identify. William & Mary estimates that actual numbers are higher.

⁴ DACA students domiciled in Virginia are eligible to apply for in-state tuition. See <http://www.schev.edu/docs/default-source/tuition-aid-section/financial-aid/dacaFAQs.pdf>.

well-trained workforce. Most significantly, the elimination of the DACA program would hinder William & Mary's pursuit of diversity and inclusion and cut against its core goal of attracting outstanding students and faculty from diverse backgrounds.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: September 29, 2017


W. Taylor Reveley III